

1 BARRY J. PORTMAN
Federal Public Defender
2 ELIZABETH M. FALK
Assistant Federal Public Defender
3 450 Golden Gate Avenue
San Francisco, CA 94102
4 Telephone: (415) 436-7700

5 Counsel for Defendant YOUNG

6
7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE NORTHERN DISTRICT OF CALIFORNIA

9 UNITED STATES OF AMERICA,
10
Plaintiff,

11 vs.

12 MICHAEL YOUNG,
13 Defendant.

)
) No. CR 07-559 JSW

) **STIPULATION AND [PROPOSED]**
) **ORDER SETTING BAIL HEARING**

) Date: March 5, 2008
) Time: 9:30 a.m.
) Court: The Honorable Joseph C.
) Spero
)
)
)

14
15 STIPULATION

16 The parties hereby stipulate and agree as follows:

- 17 1. Today, AFD Elizabeth Falk got a call from Michael Young's sister, Lashown Young.
18 Ms. Young informed defense counsel that Mr. Young's mother, Linda Young, died
19 suddenly yesterday from a heart attack;
20
21 2. The family anticipates that the funeral for Mrs. Young will be Thursday, March 6 or
22 Friday, March 7, 2008. The family is in the process of making arrangements for the
23 funeral;
24
25 3. Ms. Lashown Young asked defense counsel to request Mr. Young's temporary release
26 from custody for two days so he can attend the funeral of his mother in Los Angeles;
4. Ms. Lashown Young is currently making arrangements for the funeral, and is putting
together a proposal for the Court containing details about travel plans, as well as who
would potentially be Mr. Young's custodian in Los Angeles over the two day period the

1 family requests his release for;

2 5. Defense counsel accordingly requests a bail hearing for Mr. Young on March 5, 2008 at
3 9:30 a.m. to present the temporary release proposal to the Court;

4 6. AUSA Allison Danner has no objection to setting a bail review hearing on March 5,
5 2008 given the circumstances of the Young family. She is withholding her position on
6 the potential for Mr. Young's temporary release for the funeral until defense counsel
7 presents the aforementioned proposal to her;

8 7. Defense counsel anticipates presenting the potential release proposal to Ms. Danner on
9 Monday, March 3, 2008. She is hopeful to efile the proposal for the Court's review,
10 including the government's position on the proposal, in advance of the March 5, 2008
11 hearing date. Defense counsel will be out of the country on February 29, March 3, and
12 March 4, 2008, and will have to communicate with the necessary parties by email
13 during those dates.

14 IT IS SO STIPULATED.

15 DATED:

16 /S/
ELIZABETH M. FALK
Assistant Federal Public Defender

18 DATED:

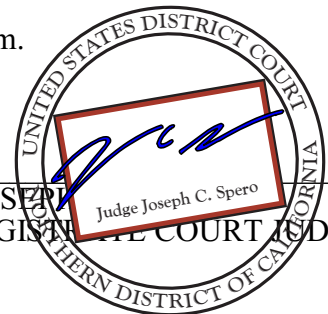
19 /S/
ALLISON MARSTON DANNER
Assistant United States Attorney

21 **[PROPOSED] ORDER**

22 Based upon the aforementioned representations of the parties, it is hereby ORDERED that a
23 further bail hearing in this matter be set on March 5, 2008 at 9:30 a.m.

25 DATED: Feb. 29, 2008

26 THE HONORABLE JOSEPH C. SPERO
UNITED STATES MAGISTRATE JUDGE



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